

FILED

JUL 25 2018 ^{KB}

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CHRISTOPHER HENDERSON,
JOHN L. PHILLIPS,
also known as "JoJo" and "Durk," and
JAIQAIL WRIGHT,
also known as "Jaigail Wright"

No. 18 CR 284

**JUDGE CHANG
MAGISTRATE JUDGE VALDEZ**

Violations: Title 18, United
States Code, Sections
922(a)(1)(A), 922(a)(3),
922(g)(1), 924(a)(1)(D), 924(n),
1512(c)(1) and 2

COUNT ONE

The SPECIAL AUGUST 2017 GRAND JURY charges:

From no later than in or about July 2016, and continuing until on or about May
10, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHRISTOPHER HENDERSON,
JOHN L. PHILLIPS,
also known as "JoJo" and "Durk," and
JAIQAIL WRIGHT,
also known as "Jaigail Wright,"

defendants herein, not being licensed importers, manufacturers, or dealers, willfully
engaged in the business of dealing in firearms;

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

COUNT TWO

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about February 1, 2017, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN L. PHILLIPS,
also known as "JoJo" and "Durk,"

defendant herein, did travel from Illinois to another State, namely, Kentucky, with the intent to engage in the unlicensed dealing of firearms in violation of Title 18, United States Code, Section 922(a)(1)(A), and did acquire firearms in that other State in furtherance of such purpose;

In violation of Title 18, United States Code, Sections 924(n) and 2.

COUNT THREE

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about February 1, 2017, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN L. PHILLIPS,
also known as "JoJo" and "Durk,"

defendant herein, not being a licensed importer, manufacturer, dealer, or collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, willfully did transport into the State of Illinois, where he then resided, firearms, namely, a Diamondback Arms Inc. DB-15, .223 caliber pistol, bearing serial number DB1818209; and a Zastava PAP M85 NP, .556 caliber pistol, bearing serial number M85-NP005128, said firearm having been purchased and obtained by the defendant outside of the State of Illinois;

In violation of Title 18, United States Code, Sections 922(a)(3) and 924(a)(1)(D).

COUNT FOUR

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about February 16, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

CHRISTOPHER HENDERSON, and
JOHN L. PHILLIPS,
also known as “JoJo” and “Durk,”

defendants herein, did travel from Illinois to another State, namely, Kentucky, with
the intent to engage in the unlicensed dealing of firearms in violation of Title 18,
United States Code, Section 922(a)(1)(A), and did acquire firearms in that other State
in furtherance of such purpose;

In violation of Title 18, United States Code, Sections 924(n) and 2.

COUNT FIVE

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about March 16, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

CHRISTOPHER HENDERSON, and
JOHN L. PHILLIPS,
also known as “JoJo” and “Durk,”

defendants herein, did travel from Illinois to another State, namely, Kentucky, with
the intent to engage in the unlicensed dealing of firearms in violation of Title 18,
United States Code, Section 922(a)(1)(A), and did acquire a firearm in that other
State in furtherance of such purpose;

In violation of Title 18, United States Code, Sections 924(n) and 2.

COUNT SIX

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about May 6, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

CHRISTOPHER HENDERSON, and
JOHN L. PHILLIPS,
also known as “JoJo” and “Durk,”

defendants herein, did travel from Illinois to another State, namely, Kentucky, with
the intent to engage in the unlicensed dealing of firearms in violation of Title 18,
United States Code, Section 922(a)(1)(A), and did acquire firearms in that other State
in furtherance of such purpose;

In violation of Title 18, United States Code, Sections 924(n) and 2.

COUNT SEVEN

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about May 27, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

CHRISTOPHER HENDERSON, and
JOHN L. PHILLIPS,
also known as “JoJo” and “Durk,”

defendants herein, did travel from Illinois to another State, namely, Kentucky, with
the intent to engage in the unlicensed dealing of firearms in violation of Title 18,
United States Code, Section 922(a)(1)(A), and did acquire firearms in that other State
in furtherance of such purpose;

In violation of Title 18, United States Code, Sections 924(n) and 2.

COUNT EIGHT

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about July 6, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

CHRISTOPHER HENDERSON, and
JOHN L. PHILLIPS,
also known as "JoJo" and "Durk,"

defendants herein, did travel from Illinois to another State, namely, Kentucky, with
the intent to engage in the unlicensed dealing of firearms in violation of Title 18,
United States Code, Section 922(a)(1)(A), and did acquire firearms in that other State
in furtherance of such purpose;

In violation of Title 18, United States Code, Sections 924(n) and 2.

COUNT NINE

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about August 24, 2017, at Hillside, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN L. PHILLIPS,
also known as "JoJo" and "Durk,"

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely, a Glock, model 26, 9 millimeter caliber semi-automatic pistol with an obliterated serial number; and a Glock, model 22, .40 caliber semi-automatic pistol, bearing serial number EEZ363US, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TEN

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about August 24, 2017, at Hillside, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN L. PHILLIPS,
also known as "JoJo" and "Durk,"

defendant herein, not being a licensed importer, manufacturer, dealer, or collector of firearms, within the meaning of Chapter 44, Title 18, United States Code, willfully did transport into the State of Illinois, where he then resided, firearms, namely, a Glock, model 26, 9 millimeter caliber semi-automatic pistol with an obliterated serial number; and a Glock, model 22, .40 caliber semi-automatic pistol, bearing serial number EEZ363US, said firearm having been purchased and obtained by the defendant outside of the State of Illinois;

In violation of Title 18, United States Code, Sections 922(a)(3) and 924(a)(1)(D).

COUNT ELEVEN

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about May 10, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JAIQAIL WRIGHT,
also known as "Jaigail Wright,"

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce ammunition, namely, six rounds of Companhia Brasileira de Cartuchos, .40 caliber ammunition, which ammunition had traveled in interstate and foreign commerce prior to defendant's possession of the ammunition;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWELVE

The SPECIAL AUGUST 2017 GRAND JURY further charges:

On or about May 11, 2018, at Kankakee, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN L. PHILLIPS,
also known as “JoJo” and “Durk,”

defendant herein, did corruptly attempt to alter, destroy, mutilate, and conceal one or more records, documents, and other objects, namely, records, documents, and photographs maintained and stored in the Facebook account “JoJo A’mf,” assigned account number 100003090115844, with the intent to impair its integrity and availability for use in an official proceeding, namely, *United States v. Christopher Henderson, et al.*, Criminal Case Number 18 CR 284, and federal grand jury investigation 17 GJ 1173, all in the United States District Court for the Northern District of Illinois;

In violation of Title 18, United States Code, Sections 1512(c)(1) and 2.

FORFEITURE ALLEGATION

The SPECIAL AUGUST 2017 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 922 and 924, as set forth in this Indictment, defendants shall forfeit to the United States of America any firearm and ammunition:

a. involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and

b. found in the possession and under the immediate control of the defendants at the time of arrest, upon conviction of any offense for committing and attempting to commit any felony involving the use of threats, force, and violence, and perpetrated in whole or in part by the use of firearms, as provided in 18 U.S.C. § 3665.

2. The property to be forfeited includes, but is not limited to:

a. a Glock, model 19, 9 millimeter pistol, bearing serial number ABXP891;

b. a Glock, model 23, .40 caliber pistol, bearing serial number BBFY989;

c. a Glock, model 26, 9 millimeter caliber semi-automatic pistol with an obliterated serial number, magazines, and associated ammunition;

d. a Glock, model 27, .40 caliber semi-automatic pistol, bearing serial number AAFH542, and associated ammunition;

e. a Glock, model 22, .40 caliber semi-automatic pistol, bearing serial number EEZ363US; and

f. two Glock magazines and six rounds of Companhia Brasileira de Cartuchos, .40 caliber ammunition.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY